

KM Private Clients Pty Ltd – Privacy Policy

Issued version 1 | August 2016

1 Privacy and KM Private Clients Pty Ltd

KM Private Clients Pty Ltd ('KM Private Clients, 'we' or 'our') understands the importance of keeping any personal information we may receive about you secure and confidential.

This privacy policy sets out how KM Private Clients collects, uses, manages and discloses personal information and how KM Private Clients aims to protect the privacy of your personal information.

KM Private Clients may update this policy from time to time.

2 Privacy Act and personal information

The *Privacy Act 1988* (Cth) ('Privacy Act') and the relevant privacy principles under the Privacy Act regulate how private sector organisations can collect, store, manage, use, disclose and provide access to personal information.

For the purposes of the Privacy Act, personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

3 Reasons for collecting personal information

KM Private Clients collects personal information primarily for the purpose of providing our services and conducting our businesses. This may involve collecting personal information from you to:

- provide advice to you, an associated entity or a third party
- consider procurement of services from you
- provide you with access to our online services
- provide our publications to you
- respond to queries you submit to us
- provide you with information about our services that may be of interest to you
- administer accounting, billing and other internal administrative services
- comply with our legal requirements under any applicable laws, including anti-money laundering legislation and any other legal requirements with which we must comply.

You are not required to provide your personal information to us. However if you choose not to provide personal information to us where requested (or provide inaccurate or incomplete information), we may not be able to provide services to you.

KM Private Clients will use the personal information for the primary purpose and potentially for a permissible secondary purpose where:

- you have consented to that secondary purpose
- it would be reasonably expected to be used for the secondary purpose
- the secondary purpose is related to the primary purpose, or
- otherwise allowed by legislation.

4 Personal information KM Private Clients collects

KM Private Clients collects personal information such as a person's name, date of birth, address, telephone number, email address, driver's licence details, passport details, tax file number, Australian business number, bank account details, investment information and employment information.

5 How KM Private Clients collects personal information

KM Private Clients collects personal information by lawful and fair means and not in an unreasonably intrusive way. Generally, KM Private Clients will collect this personal information directly from you, for example by requesting that you provide the information when you:

- enter into an agreement with us
- correspond with us.

There may be other occasions when we collect personal information about you or from other sources, such as from a publicly maintained record or from an information services provider, for example where we are required to verify your identity under anti money laundering legislation.

6 Disclosure of your personal information by KM Private Clients

From time to time we may need to disclose your personal information to a third party.

The types of third parties to which we may disclose personal information include:

- your financial, legal or other professional advisers or other persons you have authorised to act on your behalf
- service providers we engage to provide custody, administration, technology, auditing, mailing, printing or other services
- regulatory or government authorities (where required by law)
- your professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

Any such disclosures will be made on a confidential basis and, where possible, will require the third party to comply with appropriate privacy obligations.

Some of the recipients to whom KM Private Clients may disclose your personal information may be based overseas. KM Private Clients will only disclose your personal information on receipt of your consent. Your personal information may be shared for business related purposes with third party suppliers that are located overseas in Singapore and the Philippines. Such overseas recipients may not be bound by the Privacy Act. On granting your consent, you acknowledge that by consenting to KM Private Clients disclosing your personal information to overseas recipients, Australian Privacy Principle 8.1 will not apply to the disclosure. This means that KM Private Clients will not be required to take reasonable steps in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that personal information and as a result KM Private Clients may not be liable under the Privacy Act if the recipient does not act consistently with the Australian Privacy Principles.

7 Security of your personal information

KM Private Clients takes all reasonable steps to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure.

KM Private Clients has in place a number of data security, information security and other similar security policies and procedures. These policies and procedures are regularly reviewed to ensure they remain current and appropriate.

8 Accessing or changing personal information

Under the Privacy Act, you have a right to access or change your personal information that is collected and held by KM Private Clients.



If you would like to access or change the personal information KM Private Clients holds about you, you can contact KM Private Clients and request the relevant change or access. In the first instance, you should contact your KM Private Clients contact if you have one. Otherwise, please contact us as outlined below.

To action any change or access request, we will need to verify your identity and comply with our other procedures which are in place to prevent unauthorised access to personal information.

We will take all reasonable steps to provide access or make the changes to your personal information within 30 days from your request.

KM Private Clients will not normally charge you any fees or costs for access to your personal information. Fees or costs may apply if providing you with access would require us to incur retrieval or other out of pocket costs. We will notify you if any such fees or costs would be payable.

9 Privacy complaints

If you believe that KM Private Clients has contravened the Privacy Act or have any other privacy complaint regarding KM Private Clients, you can make a complaint by contacting Anthony Jackson as the Company's Privacy Compliance Manager).

KM Private Clients will seek to resolve any privacy complaints and will deal with privacy complaints as quickly as possible and in a respectful and confidential manner.

KM Private Clients will investigate any privacy complaint you make and will inform you of the outcome of your complaint following the completion of the investigation.

In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

10 How to contact us

For further information or enquiries regarding your personal information, please contact the Anthony Jackson at ajackson@kordamentha.com or on +61 3 8623 3333 or by mail at GPO Box 2985, Melbourne Victoria 3001.

